

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

FRANCISCO ABELLAN VILLENA,

GUILLERMO CIUPIAK, JAMES B.

PANTHER, JR., and FAIYAZ DEAN

Defendants.

No. 18-cv-4309 (PKC)

**PLAINTIFF’S MOTION FOR A DEFAULT JUDGMENT AGAINST
DEFENDANT FAIYAZ DEAN**

Plaintiff Securities and Exchange Commission (“SEC” or “Commission”) respectfully moves the Court to enter final judgment against Defendant Faiyaz Dean (“Dean”) pursuant to Rule 55(b)(2) of the federal Rules of Civil Procedure and Local Rule 55(b)(2). On November 18, 2018, the Clerk certified a default against Dean pursuant to Fed R. Civ. P. 55(b)(1). (Doc. 32). For the reasons set forth in the SEC’s memorandum and declaration, submitted herewith, the Court should now order injunctive relief, impose a financial penalty and enter final judgment.

Date: November 20, 2019

/s/ Daniel Maher
Daniel Maher (*admitted pro hac vice*)
Duane Thompson (*admitted pro hac vice*)
Jennie Krasner
Marc E. Johnson
Securities and Exchange Commission
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CERTIFICATE OF SERVICE

I certify that on November 20, 2019, I caused the foregoing to be filed on ECF and to be sent by email to the following.

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I further certify that, consistent with Local Rule 55.2(c), I have mailed all papers filed in connection with the foregoing to the last known business and residential addresses for Defendant Faiyaz Dean:

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/s/ Daniel J. Maher

Co-Counsel for the SEC